

IN THE DISTRICT COURT OF THE UNITED STATES  
FOR THE MIDDLE DISTRICT OF ALABAMA  
NORTHERN DIVISION

CHRISTOPHER DANIEL GAY,	)	
AIS #253514,	)	
	)	
Plaintiff,	)	CIVIL ACTION NO: 2:07-CV-1012-MHT
	)	
v.	)	
	)	
WINDOM MCGHEE, et al.	)	
	)	
Defendants.	)	

**MOTION TO EXPAND TIME**

Come now the defendants and ask the court to grant an expansion of the time in which Defendants are required to file their Answer and Special Report, up to and including January 22, 2008, from the current date of December 31, 2007, and show the Court the following in support thereof:

1. The investigation into the claims of this case is not complete due to year-end holiday annual leave of named witnesses.
2. In order to provide the court with a full and complete Report and Answer, the Alabama Department of Corrections needs an additional twenty (20) days.
3. Plaintiff will not be prejudiced in any way.

Respectfully submitted,  
KIM T. THOMAS (THO115)  
DEPUTY ATTORNEY GENERAL  
GENERAL COUNSEL

/s/ Neal P. Conner  
\_\_\_\_\_  
NEAL P. CONNER (CONN2024)  
ASSISTANT GENERAL COUNSEL

**ADDRESS OF COUNSEL:**

Alabama Department of Corrections  
Legal Division  
Post Office Box 301501  
301 South Ripley Street  
Montgomery, AL 36130-1501  
(334)353-3889

**CERTIFICATE OF SERVICE**

I do hereby certify that on the 20th day of December, 2007, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system,

And I hereby certify that I have mailed a copy of the foregoing via United States Mail properly addressed, postage prepaid first class to:

Christopher Daniel Gay  
AIS # 253514  
Frank Lee Youth Center  
P. O. Box 220410  
Deatsville, AL 36022

/s/ Neal P. Conner  
NEAL P. CONNER (CONN2024)  
ASSISTANT GENERAL COUNSEL